

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,	*	
Plaintiff,	*	
	*	
V.	*	CRIM. NO. 17-596 (PAD)
	*	
JULIO A. MARTINEZ RIVERA (3),	*	
CHRISTOPHER SAEZ-QUILES (7),	*	
JAN C. MARTINEZ RIVERA (8),	*	
ADAMES PEREZ-SANCHEZ (10),	*	
ANGEL MARTINEZ RIVERA (11),	*	
Defendant.	*	
	*	

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**INFORMATIVE MOTION**

TO THE HONORABLE PEDRO A. DELGADO,  
JUDGE OF THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO.

**COME NOW** the defendants through their attorneys, and very respectfully inform:

1. The defendants entered guilty pleas yesterday pursuant to a plea agreement with the government.
2. Counsels for defendants requested that the government amend the plea agreement to substitute the term “co-defendants” for the term “other persons” but the government refused.
3. Similarly, counsel for one of the co-defendants requested the court to

intervene in the matter, but the court ruled not to get involved in matters of plea negotiations as mandated by Federal Rule of Criminal Procedure 11(c)(1).

4. The defendants file the instant motion to place on record their objection to the use of the term “co-defendants” in the plea agreement and the government’s response to their objection.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 24th day of August, 2022.

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that this MOTION was filed through the CM/ECF system and served on all designated parties.

In San Juan, Puerto Rico this 24th day of August, 2022.

S/ Laura Maldonado Rodriguez  
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